

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE

JESSICA JONES et al.,

Plaintiffs,

v.

Varsity Brands, LLC et al.,

Defendants.

Civ. Action No. 2:20-cv-02892

**DECLARATION OF CHRISTIAN J. MAHONEY IN SUPPORT OF
DEFENDANTS' RESPONSE TO MOTION TO COMPEL**

I, Christian J. Mahoney, declare as follows:

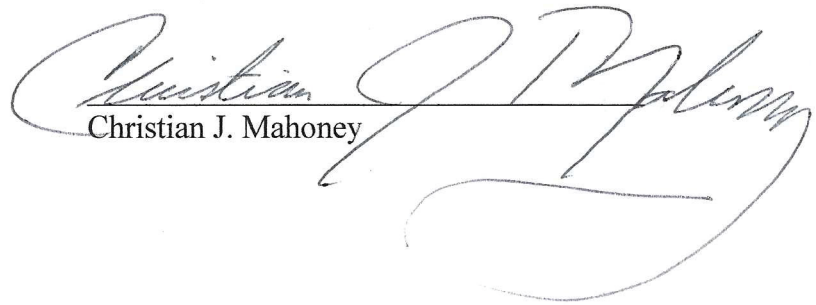
1. I am the head of the Discovery & Litigation Technology at Cleary Gottlieb Steen & Hamilton LLP and have overseen the production of documents for the Varsity Defendants in this matter and in *Fusion Elite All Stars v. Varsity Brands*, No. 2:20-cv-02600 (W.D. Tenn. 2020) (hereinafter, "*Fusion Elite*").

2. The Varsity Defendants generated approximately \$10 million in legal and related costs in connection with harvesting, processing, and reviewing documents in this matter and in *Fusion Elite*. Varsity has produced more than 600,000 pages of documents and hundreds of thousands of detailed transaction and financial data records, which have come from, among other places, the custodial files of twenty different individuals.

3. I understand that the Plaintiffs in this case seek an additional five custodians.

4. Given the cost of the twenty custodians, I estimate that the costs of harvesting, reviewing, and producing documents as Plaintiffs request would be, conservatively, at least \$1.5 million.

5. I declare under penalty of perjury that the foregoing is true and correct. Executed on
April 1, 2022.


Christian J. Mahoney